



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: BERKS COUNTY LITERACY COALITION #1 Length: :30

05/01/93	05/16/93	05/28/93
05:25:39P	03:22:41A	04:26:52A
05/02/93	05/17/93	05/29/93
05:22:19P	05:22:56A	04:17:43A
05/03/93	05/18/93	05/30/93
05:25:38A	06:24:24A	04:19:47A
05/05/93	05/19/93	05/31/93
05:23:31A	06:23:13A	04:25:43A
05/06/93	05/20/93	
11:25:43P	11:24:43P	
05/07/93	05/21/93	
03:26:45A	03:25:01A	
05/08/93	05/22/93	
07:24:00A	04:20:00A	
05/10/93	05/23/93	
03:25:52A	04:20:00A	
	09:39:40A	
05/11/93		
04:27:13A	05/24/93	
	03:25:46A	
05/12/93		
05:23:30A	05/25/93	
	04:27:01A	
05/13/93		
04:24:45A	05/26/93	
	04:25:48A	
05/14/93		
05:25:56A	05/27/93	
	11:26:53P	
05/15/93		
03:23:17A		

Notary Signature _____

Date _____

READING EXHIBIT 38
PAGE 81



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: BERKS COUNTY LITERACY COALITION #1 Length: :30

06/01/93 06/18/93 06/30/93
04:26:52A 00:26:38A 05:19:43A

06/03/93 06/19/93
01:26:53A 00:21:30A
06/05/93 06:24:30A
07:23:00A

04:20:00A 06/20/93

06/06/93 05:20:00A
04:20:00A 06:25:40A

06/08/93 06/21/93
00:27:00A
02:18:36A

06/09/93 06/22/93
00:23:54A
05:22:33P

06/10/93 06/23/93
04:22:27A
04:26:33A

06/11/93 06/24/93
04:22:29A
04:25:54A 01:25:35P

06/12/93 06/25/93
06:25:00A 01:24:48A

06/14/93 06/26/93
04:23:42A 05:22:28A

06/15/93 06/27/93
04:23:58A 05:21:15A

06/16/93 06/28/93
04:22:51A 01:25:59A

06/17/93 06/29/93

04:23:46A 04:26:51A

Notary Signature

Date

READING EXHIBIT 38
PAGE 82



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: BERKS COUNTY LITERACY COALITION #2 Length: :30

04/03/93

11:24:14P

04/09/93

10:22:10P

04/10/93

11:26:50P

04/11/93

08:47:43A

11:24:30P

04/12/93

10:25:20P

04/13/93

11:26:00P

04/14/93

11:26:52P

04/15/93

04:23:10A

04/29/93

04:21:13A

Notary Signature

Date

**READING EXHIBIT 38
PAGE 83**



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service
Announcement at the below dates and times:

Title: BERKS COUNTY LITERACY COALITION #2 Length: :30

05/04/93

08:22:13A

05/05/93

08:25:20A

05/08/93

05:26:23P

05/09/93

05:24:30P

05/13/93

09:24:47P

05/18/93

08:23:44A

05/19/93

08:25:30A

05/22/93

06:24:00A

05/23/93

06:24:00A

05/27/93

03:26:54A

05/29/93

05:26:53

05/30/93

05:26:00A

Notary Signature

Date

**READING EXHIBIT 38
PAGE 84**



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: BERKS COUNTY LITERACY COALITION #2 Length: :30

06/02/93 06/25/93
04:18:02A 04:25:38A

06/03/93 06/28/93
07:26:22A 04:26:54A

06/04/93
04:27:08A

06/05/93
05:24:30A

06/06/93
05:24:30A

06/07/93
04:25:36A

06/08/93
05:20:18A

06/09/93
03:22:19A

06/10/93
06:26:55P

06/18/93
03:26:30P

06/19/93
09:23:00A

06/21/93
03:26:40P

06/22/93
03:25:55P

Notary Signature

Date

READING EXHIBIT 38
PAGE 85

ISSUES AND PROGRAMS REPORT

THIRD QUARTER

1993

WTVE-TV 51

1729 NORTH ELEVENTH STREET
READING, PENNSYLVANIA 19604

COMPILED BY:

GEORGE MATTMILLER

OCTOBER, 1993

13). ISSUE: EDUCATION

Berks County Literacy Coalition - #1

WTVE-TV 51 produced this thirty second Public Service Announcement which focuses on the rewards of teaching someone else to read. It urges viewers to contact the Berks County Literacy Coalition to find out more about ways they can help.

Berks County Literacy Coalition - #2

Based on the success of the first Public Service Announcement, the Berks County Literacy Coalition asked WTVE-TV 51 to produce a companion spot. The thirty-second PSA. shows people trying to read foreign languages. Then it shows Americans for whom English seems like a foreign language. The PSA. urges viewers to contact the Berks County Literacy Coalition to find out more about how they can help.

Reading Public Museum - #1 ("Interactivity")

WTVE-TV 51 produced this thirty-second Public Service Announcement that urges children to become interested in geography through an interactive learning environment. Children can watch the world change before their very eyes, journey to the floor of the ocean and experience a lava flow. The spot says "Adventure is only a fingertip away". There are only 20 such interactive video displays of this nature in the world.

Reading Public Museum - #2 ("American Heritage")

WTVE-TV 51 produced this award-winning thirty-second Public Service Announcement focusing on the "American Heritage" exhibit at the Reading Public Museum. In the PSA., it is said that "American heritage comes alive at the Reading Public Museum".

National Council of Teachers of Mathematics

The National Council of Teachers of Mathematics produced this thirty-second Public Service Announcement geared toward giving children a better understanding of the mathematics they learn in school. Wynton Marcellus, jazz musician, Geoff Owens, "Cosby" show, Peter Eisenmann, architect and Catherine Black, USA Today publisher, talk to children about the need to understand mathematics for everyday use.



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the following dates & times:

Title: Berks County Literacy Coalition #1 Length: :30

7/1/93 04:24:33 AM	7/18/93 03:25:30 AM	8/7/93 05:22:27 AM	9/6/93 02:25:03 AM
7/2/93 05:20:07 AM	7/20/93 03:25:12 AM 18:25:27 PM	8/8/93 05:22:25 AM	9/7/93 02:27:17 AM
7/3/93 05:21:30 AM	7/21/93 02:21:27 AM	8/10/93 05:20:05 AM	9/8/93 02:27:17 AM
7/4/93 05:22:00 AM	04:20:08 AM	8/11/93 05:21:39 AM	9/11/93 13:27:00 PM
7/5/93 05:21:12 AM	7/22/93 02:22:28 AM	8/12/93 05:26:58 AM	9/12/93 08:35:45 AM 13:27:05 PM
7/6/93 05:22:24 AM	7/24/93 04:21:43 AM	8/13/93 04:19:22 AM	9/21/93 04:18:36 AM
7/7/93 03:20:25 AM	7/25/93 04:18:28 AM	8/16/93 04:21:15 AM	9/22/93 04:22:49 AM
7/8/93 05:22:34 AM	7/26/93 02:17:22 AM	8/17/93 02:22:30 AM	9/23/93 17:26:00 PM
7/9/93 03:18:49 AM	7/27/93 05:19:43 AM	8/18/93 03:22:30 AM	9/24/93 13:56:50 PM
7/10/93 05:22:15 AM	7/28/93 05:22:10 AM	8/19/93 05:22:31 AM	9/25/93 04:23:18 AM
7/11/93 05:20:39 AM	7/29/93 05:20:43 AM	8/20/93 04:25:43 AM	9/26/93 04:27:07 AM
7/12/93 03:18:45 AM	7/31/93 04:25:39 AM	8/21/93 14:52:00 PM	9/27/93 10:26:35 AM 13:45:04 PM
7/13/93 03:19:47 AM	8/1/93 04:26:57 AM	8/23/93 04:22:56 AM	9/28/93 05:22:14 AM
7/14/93 06:26:56 AM	8/3/93 05:20:49 AM	8/24/93 04:24:10 AM	
7/17/93 03:27:00 AM	8/4/93 02:21:26 AM	9/3/93 02:27:10 AM	
	8/5/93 02:22:29 AM		

READING EXHIBIT 38
PAGE 88



WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the following dates & times:

Title:	Berks County Literacy Coalition #2	Length:	:30
7/1/93	8/5/93	9/21/93	
18:54:25 PM	06:26:35 AM	06:24:09 AM	
7/6/93	8/6/93	9/22/93	
02:18:21 AM	04:22:01 AM	06:27:15 AM	
10:22:55 AM			
7/8/93	8/9/93	9/23/93	
02:22:24 AM	04:22:23 AM	04:22:43 AM	
10:22:55 AM	8/10/93	9/24/93	
	03:21:03 AM	03:19:47 AM	
7/13/93			
23:24:00 PM	8/13/93	9/28/93	
	06:24:11 AM	07:28:13 AM	
7/20/93		23:25:20 PM	
17:26:24 PM	8/19/93		
	03:24:29 AM		
7/22/93			
06:22:15 AM	8/21/93		
	07:25:10 AM		
7/24/93	19:22:23 PM		
07:28:00 AM			
18:26:50 PM			
	8/23/93		
7/25/93	06:26:03 AM		
18:24:51 PM	21:24:50 PM		
7/27/93	8/25/93		
03:22:30 AM	05:28:59 AM		
	12:24:02 PM		
7/28/93			
03:22:21 AM	8/28/93		
	04:26:45 AM		
7/29/93			
03:21:07 AM	9/1/93		
	03:21:40 AM		
7/30/93			
03:17:50 AM	9/2/93		
	03:22:21 AM		
8/2/93			
03:20:36 AM	9/7/93		
	20:31:42 PM		
8/4/93			
06:24:58 AM	9/13/93		
	17:25:38 PM		

READING EXHIBIT 38
PAGE 89

ISSUES AND PROGRAMS REPORT

FOURTH QUARTER

1993

WTVE-TV 51

1729 NORTH ELEVENTH STREET

READING, PENNSYLVANIA 19604

COMPILED BY:

GEORGE MATTMILLER

OCTOBER, 1993

READING EXHIBIT 38
PAGE 90

12). ISSUE: EDUCATION

Berks County Literacy Coalition - #1

WTVE-TV 51 produced this thirty second Public Service Announcement which focuses on the rewards of teaching someone else to read. It urges viewers to contact the Berks County Literacy Coalition to find out more about ways they can help.

Berks County Literacy Coalition - #2

Based on the success of the first Public Service Announcement, the Berks County Literacy Coalition asked WTVE-TV 51 to produce a companion spot. The thirty-second PSA. shows people trying to read foreign languages. Then it shows Americans for whom English seems like a foreign language. The PSA. urges viewers to contact the Berks County Literacy Coalition to find out more about how they can help.

Reading Public Museum - #1 "Interactivity"

WTVE-TV 51 produced this thirty-second Public Service Announcement that urges children to become interested in geography through an interactive learning environment. Children can watch the world change before their very eyes, journey to the floor of the ocean and experience a lava flow. The spot says "Adventure is only a fingertip away". There are only 20 such interactive video displays of this nature in the world.

Reading Public Museum - #2 "American Heritage"

WTVE-TV 51 produced this award-winning thirty-second Public Service Announcement focusing on the "American Heritage" exhibit at the Reading Public Museum. In the PSA., it is said that "American heritage comes alive at the Reading Public Museum".

American Legion - "School Contest"

The American Legion sponsors this thirty-second Public Service Announcement in conjunction with the National High School Oratorical Contest. Entitled "School Contest", the PSA. shows a girl explaining how a college scholarship search can wear one out. She then goes on to explain how a high school student can qualify to receive a scholarship from the American Legion by competing in a contest.

ISSUES AND PROGRAMS REPORT
FIRST QUARTER
1994

WTVE-TV51-TV 51
1729 NORTH ELEVENTH STREET
READING, PENNSYLVANIA 19604

COMPILED BY:
GEORGE MATTMILLER

"Berks County Museum Council" - #2

Another thirty-second Public Service Announcement, produced by WTVE-TV51-TV 51 in conjunction with the local museum foundation, promotes the following additional historic area attractions:

- *Hopewell Village
- *Berks County Heritage Center
- *Old Dry Road Farm
- *Historic Preservation Trust of Berks County
- *Daniel Boone Homestead

Take 3 - #15 "Planetarium"

This show covers the inner workings of the Reading Planetarium and it shows with Jeremy Posey as its hosts.

12). ISSUE: EDUCATION

"Berks County Literacy Coalition" - #1

WTVE-TV51-TV 51 produced this thirty second Public Service Announcement which focuses on the rewards of teaching someone else to read. It urges viewers to contact the Berks County Literacy Coalition to find out more about ways they can help.

"Berks County Literacy Coalition" - #2

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WTVE TV51 CERTIFICATION OF AFFIDAVIT PERFORMANCE REPORT

Page: 1

This is to certify that WTVE-TV51 aired the following announcements
at the dates and times shown below (times accurate within 15 minutes):

Title: BERKS COUNTY LITERACY COALITION Length: :30 Type: PSA

01/02/94 09:59:30	01/31/94 03:17:00 14:46:10	02/15/94 00:54:00 05:21:30 15:21:30	03/07/94 03:54:30 21:21:30	03/30/94 21:20:30
01/03/94 17:20:30 23:46:40	02/01/94 03:17:00 14:46:10	02/16/94 00:54:00 05:21:30 15:21:00	03/08/94 03:54:30 21:21:30	03/31/94 04:21:30 05:17:00 21:20:30
01/04/94 04:21:30	02/03/94 05:21:30 21:21:30	02/17/94 05:46:40	03/09/94 03:54:30 21:21:30	
01/05/94 04:20:30	02/04/94 00:54:00 05:21:30 15:21:00	02/18/94 05:46:40	03/10/94 03:54:30	
01/09/94 09:59:30	02/05/94 02:17:00	02/19/94 02:17:00	03/11/94 03:54:30 07:17:30	
01/10/94 19:17:30	02/06/94 02:17:00	02/20/94 06:29:00	03/12/94 14:21:30	
01/11/94 02:17:00 09:17:30 12:21:30 14:21:30	02/07/94 00:54:00 05:21:30 12:17:00 15:20:30	02/21/94 05:46:40	03/13/94 05:46:40	
01/12/94 02:17:00	02/08/94 00:54:00 05:21:30 15:21:30	02/22/94 05:46:40 07:46:40	03/14/94 03:54:30 21:21:30	
01/13/94 02:17:00 12:21:00	02/09/94 00:54:00 05:21:30 15:21:00	02/23/94 05:46:40 07:46:40	03/16/94 07:21:30	
01/16/94 14:21:30	02/10/94 00:54:00 05:21:30 15:21:00	02/24/94 05:46:40 07:46:40	03/17/94 20:21:30	
01/22/94 02:17:00	02/11/94 01:46:40 14:21:00	03/01/94 03:54:30	03/19/94 05:46:40	
01/23/94 02:17:00	02/12/94 02:17:00 17:21:30	03/02/94 03:54:30	03/20/94 05:46:40	
01/26/94 09:21:30 16:21:00	02/13/94 02:17:00 17:21:30	03/03/94 02:21:30 02:21:30 03:54:30 03:54:30 16:18:00	03/25/94 13:47:10	
01/27/94 09:21:30 16:21:00	02/14/94 00:54:00 05:21:30 15:21:00	03/04/94 03:54:30	03/26/94 13:47:10	
01/28/94 03:17:00 14:46:10	02/15/94 02:17:00 17:21:30	03/05/94 02:21:30 03:54:30 03:54:30 16:18:00	03/27/94 08:29:20 13:47:10	
01/29/94 02:17:00	02/16/94 00:54:00 05:21:30 15:21:00	03/06/94 02:21:30 03:54:30 03:54:30 16:18:00	03/28/94 13:47:10	
01/30/94 02:17:00	02/17/94 05:46:40	03/07/94 03:54:30 21:21:30	03/29/94 13:47:10	
	02/18/94 05:46:40	03/08/94 03:54:30 21:21:30	03/30/94 04:21:30 05:17:00 21:20:30	

READING EXHIBIT 38
PAGE 94

ISSUES AND PROGRAMS REPORT
SECOND QUARTER
1994

WTVE-TV 51
1729 NORTH ELEVENTH STREET
READING, PENNSYLVANIA 19604

COMPILED BY:
GEORGE MATTMILLER

WTVE TV51 CERTIFICATION OF AFFIDAVIT PERFORMANCE REPORT Page: 1

This is to certify that WTVE-TV51 aired the following announcements
at the dates and times shown below (times accurate within 15 minutes):

Title: BERKS COUNTY LITERACY COALITION Length: :30 Type: PSA

04/01/94 03:17:00	04/19/94 06:54:30	05/08/94 23:21:30	06/14/94 09:54:30 23:21:30
04/02/94 03:17:00 21:21:30	04/21/94 04:17:00 14:46:40	05/09/94 23:21:30	06/15/94 09:54:30 23:21:30
04/03/94 03:17:00 10:46:13 21:21:30	04/22/94 04:21:30	05/14/94 17:46:40	06/16/94 23:21:30
04/04/94 03:17:00 21:21:30	04/23/94 04:21:30	05/15/94 17:46:40	06/17/94 17:21:30
04/05/94 03:17:00 21:21:30	04/24/94 04:21:30	05/26/94 07:46:10 18:21:30	06/18/94 23:21:30
04/06/94 03:17:00 21:21:30	04/25/94 04:21:30	05/27/94 07:46:10	06/19/94 09:29:17 23:21:30
04/07/94 04:17:00	04/26/94 05:21:30	05/28/94 07:46:10 18:21:30	06/20/94 23:21:30
04/08/94 04:17:00	04/27/94 05:21:30	05/29/94 05/29/94 18:21:30	06/21/94 23:21:30
04/09/94 02:21:30 08:46:10	04/28/94 05:21:30	05/30/94 07:46:10 18:21:30	
04/10/94 02:21:30	04/29/94 05:21:30	05/31/94 07:46:10 11:21:00 18:21:30	
04/11/94 04:17:00	05/01/94 05:21:30 22:21:30	06/01/94 18:20:30	
04/12/94 04:17:00	05/02/94 05:21:30 23:21:30	06/02/94 18:20:30	
04/13/94 04:17:00	05/03/94 05:21:30	06/03/94 18:20:30	
04/14/94 04:17:00 20:21:30	05/04/94 05:21:30	06/05/94 18:20:30	
04/15/94 00:21:30 06:54:30	05/05/94 05:21:30 16:21:30	06/06/94 21:54:00	
04/16/94 06:54:30	05/06/94 03:17:00 05:21:30	06/07/94 13:21:30	
04/18/94 06:54:30	05/07/94 23:21:30	06/08/94 13:21:30 21:21:00	
		06/13/94 21:21:30	

**Exhibit 39 DEPOSITION OF DANIEL DILLARD
OCTOBER 29, 1999, 12:30 P.M.**

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re: Applications of : MM Docket No. 99-153
READING BROADCASTING, INC. :
For Renewal of License of : File No. BPCT-940407KF
Station WTVE (TV), Channel :
51, Reading, Pennsylvania :
and : File No. BPCT-940630KG
ADAMS COMMUNICATIONS :
CORPORATION :
For Construction Permit for :
a New Television Station :
to Operate on Channel 51, :
Reading, Pennsylvania :

DEPONENT: DANIEL DILLARD

DATE AND TIME: Friday, October 29, 1999
at 12:03 p.m.

LOCATION: Comfort Inn
2200 Stacy Drive
Reading, Pennsylvania

Berks Court Reporting Service
By: Lori A. Dilks, RPR
12 Pacific Avenue
Sinking Spring, Pennsylvania
(610) 678-9984

COPY

1 APPEARANCES:

2 HOLLAND & KNIGHT, LLP
 3 By: Thomas J. Hutton, Esquire
 4 2100 Pennsylvania Avenue, N.W.
 Suite 400
 Washington, D.C. 10037-5564

5 Representing Reading Broadcasting, Inc.

6 BECHTEL & COLE, CHARTERED
 7 By: Gene A. Bechtel, Esquire
 8 1901 L Street, N.W., Suite 250
 Washington, D.C. 10036

9 Representing Adams Communications

10
 11 STIPULATION: It has been stipulated by and between
 12 counsel that they waive the sealing of the transcribed
 13 testimony by the witness, and the filing of the original
 with the Court, and all objections, except as to form,
 until the time of trial.

14
 15 I N D E X

17 <u>WITNESS</u>	<u>EXAMINED BY</u>	<u>PAGE</u>
18 Daniel Dillard	Mr. Bechtel	3
	Mr. Hutton	4
	Mr. Bechtel	12

20 EXHIBITS

21 <u>NUMBER</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
22 Dillard 1	Issues and Programs Report	4

1 P R O C E E D I N G S

2 DANIEL DILLARD

3 was called as a witness and, having been first duly
4 sworn by the Reporter-Notary Public, was examined and
5 testified as follows:

6 BY MR. BECHTEL:

7 Q. My name is Gene Bechtel. I am counsel for
8 Adams Communications Corporation. You met Mr. Hutton
9 who is counsel for Reading Broadcasting Company.

10 If my questions are unclear, let me know.
11 If Mr. Hutton interjects after I've asked a question,
12 wait until he and I talk. And if you need a break, just
13 say so although history has taught us that these
14 sessions are not taxing. As a matter of fact, Mr.
15 Hutton has prepared materials which focus on our work
16 and are very useful.

17 How long have you lived in the Reading
18 area?

19 A. I don't live in the Reading area. I live
20 in the Lehigh Valley. Our organization serves the
21 Reading area and has for 13 or 14 years that I've been
22 with the Burn Prevention Foundation.

23 Q. And how far away from Reading do you live?

24 A. I live approximately 35 to 40 miles.

25 Q. Do you know, sir, do you receive Channel 51

1 on your television?

2 A. No, I don't.

3 MR. BECHTEL: Why don't you go ahead, Tom.

4 MR. HUTTON: I would like to have this
5 document marked as Dillard Exhibit 1.

6 (Whereupon, the Reporter marked Dillard
7 Exhibit No. 1 for identification, Issues and Programs
8 Report.)

9 BY MR. HUTTON:

10 Q. Mr. Dillard, as a preliminary matter, let
11 me ask you what your title is with your organization and
12 what your organization does.

13 A. I'm the Executive Director of the Burn
14 Prevention Foundation, have been for the last 14 years.
15 Our organization develops and distributes educational
16 materials and curricula relevant to the prevention of
17 burn injury, works with the community to educate those
18 groups at highest risk to burn injury, and works to
19 coordinate a comprehensive regional health care network
20 of providers of burn care services.

21 Q. Let's go into the document. You have not
22 seen this before. This document is a compilation of
23 quarterly issues and programs reports that the station
24 compiles on a quarterly basis. And in the quarterly
25 reports there are excerpts that refer to your foundation

1 or to related organizations.

2 I would like to ask you to review the
3 second page of that document and tell me if that
4 description there accurately describes the work that TV
5 51 did with the Burn Foundation in the second quarter of
6 1990.

7 A. (Witness reviewed document.)

8 Yes, that accurately represents the work
9 that they did for us in relation to our fund raising
10 event, the Concours D'Elegance.

11 Q. And what was the nature of that fund
12 raiser?

13 A. It's an invitation only classic car show
14 designed to attract a regional and national audience to
15 raise funds through sponsorship, contributions, and
16 ticket price to view the show. The proceeds of the show
17 all go to support our charitable programs in the area.

18 Q. And were any other television stations
19 involved in that event?

20 A. To my knowledge, in the early years of the
21 show -- or in this year, 1990, no other TV stations
22 covered the show, at least did not provide any
23 precoverage of the show and did not do any extensive
24 recording of the show such as TV 51 did when they
25 produced the 60-65 minute video for us which we used for

1 promotional purposes.

2 Q. And did you pay TV 51 for that work on that
3 video?

4 A. No.

5 Q. Turning now to the second quarter of 1991,
6 again, there is a description of the work that the
7 station did, this time in connection with the second
8 event of that nature, the Concours D'Elegance. I'd like
9 you to review that and let me know if that is accurate
10 or inaccurate with respect to the work that they did at
11 that time.

12 A. (Witness reviewed document.)

13 To my recollection, that is accurate.

14 Q. And were they paid for the work they did in
15 1991?

16 A. No. To my knowledge, we did not pay them
17 for that. It was all donated services.

18 Q. And for the 1991 event, was there any other
19 television station involved in promoting it or covering
20 the event the same way TV 51 was?

21 A. Not in the same way. I don't recall in '91
22 if -- I think we sent the 30-second promo spots out to
23 other local stations as a PSA, and it's possible that
24 some of those carried it as a PSA. But that would have
25 been the extent of other TV coverage.

15

1 Q. Turning now to the third quarter of 1991, I
2 would like you to review the entry under Burn Prevention
3 Foundation and tell me if that is consistent with your
4 recollection.

5 A. (Witness reviewed document.)

6 Yes, it is.

7 Q. And turning to the first quarter of 1992, I
8 would like you to refer to the narrative under Burn
9 Prevention Foundation and tell me if that is accurate
10 with your recollection?

11 A. (Witness reviewed document.)

12 Yes, that's accurate as I recall.

13 Q. And the same question for the second
14 quarter of 1992.

15 A. (Witness reviewed document.)

16

16 Yes, correct.

17 Q. Turning now to the first quarter of 1993,
18 there's a reference to a Smoke Detectors' PSA, and I'd
19 like to ask you if you are familiar with that PSA.

20 A. (Witness reviewed document.)

21 I'm not familiar with that specific PSA by
22 Underwriter Laboratories.

23 Q. Turning now to the second quarter of
24 1993 -- now, for 1992 and 1993, I don't see entries for
25 the Concours D'Elegance. Did the event continue?